

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

CLASSIFICATION AND FEES FOR WEIGHT-AVERAGED
NONLETTER-SIZE BUSINESS REPLY MAIL, 1999

Docket No. MC99-2

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORY OF
DOUGLAS CARLSON
(DFC/USPS-T3-1)**

The United States Postal Service hereby files the response of witness Schenk to the following interrogatory of Mr. Douglas Carlson, which was filed on May 1, 1999: DFC/USPS-T3-1.

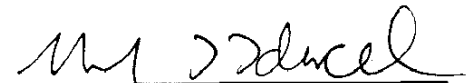
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 5, 1999
(Tel: (202) 268-2998/ FAX: -5402)

RESPONSE OF U.S. POSTAL SERVICE WITNESS SCHENK TO
INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T3-1.

- a. Are you aware that the film processor referred to on page 3 of your confidential workpaper receives exposed film in mailers addressed to cities other than the ones listed on page 3 of your confidential workpaper?
- b. Are mailers sent to those other cities included in your sample and analysis? If not, please explain why not.

RESPONSE:

- a. Yes.
- b. No. The BRM recipient in question did not request that the experiment be implemented at these other sites, nor did it choose to Priority Mail re-ship the volume sent to these other cities to its experimental location (as it chose to re-ship from the cities listed in my workpaper). There may be business reasons why a customer would exclude the volume mailed to certain locations, on both an experimental and a permanent basis.

DECLARATION

I hereby declare under penalty of perjury that the foregoing responses to interrogatories are true to the best of my knowledge, information, and belief.

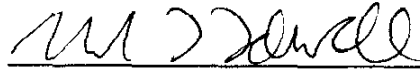
A handwritten signature in cursive script, appearing to read "Leslie M. Schenk", is written over a horizontal line.

Leslie M. Schenk

Date: 5-5-99

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being mailed today to all parties of record in accordance with Rule 12 of the Commission's Rules of Practice and Procedure.

A handwritten signature in dark ink, appearing to read "M T Tidwell", written over a horizontal line.

Michael T. Tidwell

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